

JONES DAY

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May 26, 2020

**VIA ECF**

The Honorable Debra Freeman  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

The requested adjournments are granted. The telephonic initial pretrial conference will be held on 6/16/20 at 2:00 p.m.

Dated: 5/27/20  
SO ORDERED

  
DEBRA FREEMAN  
United States Magistrate Judge

Dear Judge Freeman:

I represent the Defendant Experian Information Solutions, Inc. (“Experian”) in the above-referenced matter. I write to respectfully request adjournment of the deadline for the Joint Letter and Proposed Case Management Plan (“Joint Letter and Proposed CMP”) and the Fed. R. Civ. P. 16 Initial Pretrial Conference (“Initial Conference”).

The Court has scheduled the deadline for the Joint Letter and Proposed CMP on May 26, 2020, and the Initial Conference on June 2, 2020, at 10:00 AM. (ECF No. 6). Experian requests adjournment of both dates because Experian has been unable to contact Plaintiff to discuss a proposed joint discovery plan or detail for this matter. Adjournment of both dates for two weeks would permit all parties to more productively meet-and-confer on the Joint Letter and Proposed CMP, potential settlement, and the subjects to be considered at the Initial Conference.

There have been no previous requests for adjournments. Plaintiff has not responded to Experian’s communications regarding the current deadline or request for extension. If Plaintiff and Experian are still unable to discuss this matter Experian requests permission to file a proposed discovery plan:

- Proposed Deadline to submit Proposed Discovery Plan (either Jointly or by Experian): June 9, 2020.

Experian can be available at any time during the Week of June 15<sup>th</sup> to participate in an initial conference.

Thank you for your time and consideration of this request.

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Respectfully submitted,

/s/ Cealagh P. Fitzpatrick  
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*Attorneys for Experian Information  
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cc: Counsel of Record via ECF